

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JDOG FRANCHISES, LLC,

Plaintiff,

v.

NAF FAMILY GROUP INC., and
PEDRO BARNES,

Defendants.

Civil Action No.: 2:24-cv-00285

**PLAINTIFF’S MOTION FOR TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION PURSUANT TO FED. R. CIV. P. 65**

Pursuant to Rule 65 of the Federal Rules of Civil Procedure, Plaintiff, JDog Franchises, LLC (“Plaintiff” or “JDog”), through counsel, respectfully moves for a temporary restraining order, preliminary injunction, and permanent injunction.

As detailed in the proposed order, JDog requests temporary, preliminary, and permanent restraints to enjoin Defendants, NAF Family Group, Inc. (“NAF”) and Pedro Barnes (“Barnes” and, with NAF, the “Defendants”), for a period of twenty-four months, from directly or indirectly, or in any capacity whatsoever, within a fifteen mile radius of the Defendants’ former territory, or within the metropolitan area in which their territory was situated, from competing with JDog or engaging any business or enterprise similar in nature to the JDog franchise system, or offering for sale any products similar to the services provided when Defendants were JDog franchisees. JDog further seeks an order requiring Defendants to assign all telephone numbers and URLs associated with their formerly-franchised business to JDog.

In support of its Motion, JDog relies upon and incorporates its Verified Complaint, and the corresponding exhibits thereto, and the attached Memorandum of Law.

WHEREFORE, JDog respectfully requests that the Court grant its Motion and grant the relief requested in the proposed orders.

Dated: January 22, 2024
Chadds Ford, Pennsylvania

THE FRANCHISE FIRM LLP

/s/ Evan M. Goldman

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